

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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Mingfei Zhu	:	
	:	
Plaintiff,	:	Case No. 24-cv-01139
	:	
-against-	:	Judge: Hon. Virginia M. Kendall
	:	
The Partnerships and Unincorporated Associations Identified in Schedule “A”	:	Magistrate Hon. Beth W. Jantz
	:	
Defendants.	:	
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MOTION FOR EXPEDITED LIMITED DISCOVERY

Defendants, D FantiX, aooyao store and yadingchuangxinkeji, GIRIBIT, warminrog and Krislait (“D FantiX”, “aooyao”, “yading”, “GIRIBIT”, “warminrog” and “Krislait” respectively and “Defendants” collectively) by and through its undersigned counsel, hereby move this Court for an Order for expedited limited discovery on Plaintiff and on Jian Chen regarding their contradicting and mutually exclusive under-oath-statements in connection with the claimed product of U.S. Patent No. D1,000,857 (“the ‘857 Patent”). Specifically, Jian Chen stated under oath that he is “the original inventor,” and Plaintiff stated under oath that he “invested substantial time, money, and effort creating the product.”

Allowing an expedited limited discovery will help to the bottom of the contradicting under-oath statements from Jian Chen and the Plaintiff.

Therefore, Defendants must be allowed to do limited discovery on Jian Chen and the Plaintiff regarding the contradicting under-oath statements.

Dated: May 7, 2024

/s/Lance Liu
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CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2024, a copy of the foregoing document was filed electronically through the Court's CM/ECF NextGen system with notice of filing automatically sent electronically to counsels of record.

Dated: May 7, 2024

Respectfully submitted,

/s/Lance Liu

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